Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

Title V Draft Permit No. V-99-035 (Revision 4)
DAWSON MANUFACTURING COMPANY
MORGANFIELD, KY.
May 24, 2004
JIM MORSE, REVIEWER
Plant I.D. # 21-225-00064
Application Log # 54966

SOURCE DESCRIPTION:
Dawson coats rubber and metal parts for the automotive industry. The rubber and steel parts are manufactured elsewhere. Steel parts are abraded in the Wheelabrator Tumblast units, cleaned and treated in a phosphating bath, sprayed with adhesive, and bonded to the rubber parts.

COMMENTS:
12/19/2003
Action under log #'s 54656, 54966 is to construct 3 I.D. (Internal Diameter) coaters, 2 Dog Bone sprayers, 2 Chain-on-Edge coaters, an 8000 gal. storage tank for toluene and 4 strip tanks and a second Tumble Cleaner in the Mixing Room. This writer, Rick Shewekah and Steve Sanders inspected the source in Summer 2003. Based on findings the revised permit calls for capture efficiency testing of all affected facilities. This has not been done previously. The source claimed 100% capture efficiency as part of the design of the affected facilities. The emission calculations have been revised for an assumption of 95% capture. This may be further revised based on the results of testing.
3/4/2002
Action under this log #54140 is a minor permit revision to allow construction of a Dip and Spin Coating Machine and a Roll Coater, as well as introducing a new material, Chemlok 256. The new coaters will be controlled by the existing catalytic oxidizer. The DIP Coating tank is to be removed. The net increase in VOC emissions is to be 6 tons.
7/31/2001
Action under this log #53556 is to restrict emissions of VOC's to less than 95 ton/yr and to permit construction of two new chain on edge coating facilities. Also the parts cleanup/materials room has been removed from the oxidizer load to achieve a better utilization of oxidizer capacity by controlling the chain on edge facilities.
Spraying of adhesive is controlled first by particulate filters, then by catalytic oxidation. All operations will be totally enclosed and capture efficiency is 100%. Oxidizer destruction efficiency is tested at 93%.
9/24/1999
The Tumblast units have cartridge dust control filters with efficiency of 98%.
The phosphating process has no controls.
The R & D Spray Booth and the Parts Cleanup/Material Room are uncontrolled.
Emission factors were provided by the consultant, using a material balance. The writer has reviewed the information provided and concurs with those calculations.

Regulation 401 KAR 59:010 will apply to emissions of particulates from the Wheelabrators, the adhesive spray, the R & D Spray Booth, and the phosphating process. However, the phosphating process emissions will place that point in the insignificant activities category.
Regulation 401 KAR 59:015 applies to emissions from the two existing natural gas boilers.

PERIODIC MONITORING
VOC emission control inlet and outlet temperatures are monitored continuously
Opacity and particulate emissions are assumed to meet limits when controls are in place and functioning. PM controls are monitored by visual inspection once per shift.

EMISSION AND OPERATING CAPS DESCRIPTION:
Dawson Manufacturing has voluntarily assumed a cap of less than 95 tons per year of VOC's to avoid applicability of Regulation 401 KAR 59:225. The source will still be major for HAP's after controlling VOC's by oxidation.

CREDIBLE EVIDENCE:

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.